

Jorgensen, Jay T.

From: Bond, Michael R. [mailto:Michael.Bond@KutakRock.com]
Sent: Friday, May 30, 2008 05:14 PM
To: David Page; robert.george@tyson.com; Jorgensen, Jay T.
Cc: Kelly.Burch@oag.ok.gov; lbullock@bullock-blakemore.com; David Riggs; Baker, Fred; Ward, Liza; Bob Nance; Richard Garren; Xidis, Claire; Bob Nance
Subject: RE: Tyson RFP Concerning Modeling Documents

David, per your suggestion on our call on Wednesday I have discussed with our experts what they need with respect to Plaintiffs' Models. First and foremost they need a working copy of each of the Models utilized by your experts. In layman's terms they need the working version of the Models that Plaintiffs' experts actually sat down and used. This is covered under Tyson Foods, Inc. April 17, 2008 Request for Production No. 1.

Additionally the following information must be provided.

- Model code files required to create all model executable files
- Model code compilation files and full documentation of the compilation options/specifications
- Model executables required to run the models for all applications included in the expert reports
- Model input and output files for the model calibrations
- Model input and output files for the model validations
- Model input and output files for all sensitivity and uncertainty analyses conducted
- Model input and output files for all forecast scenarios
- Pre-processors used for all model inputs including: source codes, compilation options, executables, and all databases/spreadsheets required for pre-processing of the model inputs
- Processors used for model calibration and validation data including: source codes, compilation options, executables, databases, and spreadsheets
- Post-processors used for model outputs including: source codes, compilation options, and executables
- Databases/spreadsheets required to conduct post-processing of model output for calibration, validation, uncertainty/sensitivity analysis, and forecast scenarios
- Post-processed files from all model runs including calibration, validation, sensitivity/uncertainty analysis, and forecast scenarios

- Text files, databases and spreadsheets used for evaluating and presenting results from these post-processed files

All of the above information is covered by the April 17, 2008 Requests for Production and must be produced. At this time I have not been provided with all the requested information. Please advise as to when you intend to complete this production.

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From: David Page [mailto:dpage@riggsabney.com]
Sent: Thursday, May 29, 2008 8:12 AM
To: Bond, Michael R.; robert.george@tyson.com
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Pursuant to our call yesterday, I can confirm that all of the "documents" responsive to the above referenced request for production (RFP) concerning the modeling information should be included in the "considered materials" produced with Dr Engel's and Dr Wells' expert reports. In order to hopefully avoid any confusion as to which of the considered documents are responsive to each individual request, next week, I will prepare a supplemental response to these requests that will include a separate production, (that we believe is a duplicate of the items produced in the considered materials) on discs or DVDs that will separately identify and include (by file name on the disc and by RFP number) the requested documents that the State or its experts (Engel and Wells) have that are responsive to each of your RFPs.

Please call if you have any questions.

Thanks, David.

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